

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KIMBERLY GENEREUX,
Plaintiff,

v.

COLUMBIA SUSSEX CORPORATION
d/b/a WESTIN CASUARINA HOTEL,
STARWOOD HOTELS & RESORTS
WORLDWIDE, INC., WESTIN LICENSE
COMPANY, WESTIN LICENSE
COMPANY NORTH, INC., WESTIN
MANAGEMENT COMPANY EAST,
WESTIN NORTH AMERICA
MANAGEMENT COMPANY, INC.,
GALLEON BEACH RESORT, LTD., and
CORPORATE DEFENDANTS X1-100,
Defendants.

C.A. NO. 05-CV-10879-JLT

MOTION TO ADMIT COUNSEL PRO HAC VICE
(WITH ASSENT OF ALL COUNSEL)

Pursuant to Rule 83.5.3(b) of the Local Rules of the United States District Court for the District of Massachusetts, John B. Johnson, who is a member in good standing of the bar of this court and who is counsel for defendant Columbia Sussex Corporation ("Columbia") in this case, moves that Robert Brown, of the law firm Mendes & Mount, 750 Seventh Avenue, New York, NY 10019, be permitted to appear as co-counsel for defendant Columbia and practice in this court for the purposes of this particular case. Counsel for all parties have given their assent to the allowance of this motion.

In support of this motion, the moving party says as follows:

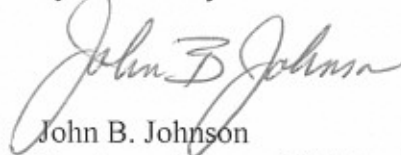
1. Attorney Brown is a member of the bar in good standing in every jurisdiction where he has been admitted to practice (see Attorney Brown's affidavit filed with this motion).

2. There are no disciplinary proceedings pending against Attorney Brown in any of the jurisdictions where he has been admitted to practice (see attached affidavit); and

3. Attorney Brown is familiar with and will follow in this case the Local Rules of the United States District Court for the District of Massachusetts (see attached affidavit).

In light of the above, it is submitted that Attorney Brown be permitted to appear and practice before this Court as co-counsel for defendant Columbia in this case.

Columbia Sussex Corporation,
by its attorney



John B. Johnson
Corrigan, Johnson & Tutor, P.A.
141 Tremont Street
Boston, MA 02111
(617) 338-0075
BBO No. 252580

Assented To:



Mark F. Itzkowitz
85 Devonshire Street, Suite 1000
Boston, MA 02109-3504

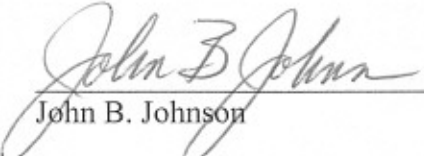


Lynn A. Kappelman
Seyfarth Shaw, LLP
2 Seaport Lane
Boston, MA 02210

Dated: December 2, 2005

CERTIFICATE OF SERVICE AND
CERTIFICATION UNDER LR 7.1(A)(2)

I hereby certify that a true copy of the above document was served upon Attorneys Mark Itzkowitz, for the plaintiff, and Lynn Kappelman, for the co-defendants, by mail on December 2, 2005, and that both counsel notified me that they would assent to the allowance of this motion.



John B. Johnson

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Defendants.

AFFIDAVIT OF ROBERT BROWN, ESQUIRE IN
SUPPORT OF MOTION TO APPEAR PRO HAC VICE

In support of the Motion of Attorney John B. Johnson that I be allowed to appear Pro Hac Vice as co-counsel for defendant Columbia Sussex Corporation, I, Robert Brown, do hereby depose and say as follows:

1. I am a partner with the law firm Mendes & Mount, LLP, 750 Seventh Avenue, New York, NY 10019-6829 and have been retained to represent defendant Columbia Sussex Corporation in this litigation.

2. I have been certified to practice law continuously in the State of New York since 1984. I am presently a member in good standing of the Bar in this jurisdiction, and there are no disciplinary proceedings pending against me.

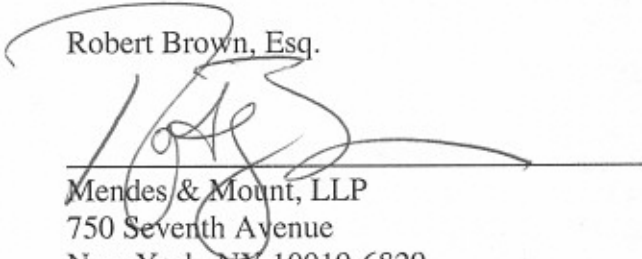
3. I have continuously been admitted to practice before the U.S. District Court for both the Southern and Eastern Districts of New York since 1984. I have been admitted to practice before the U.S. Court of Appeals, First and Second Circuits, since 1993. I am a member in good standing before each of these courts, and there are no disciplinary actions pending against me.

4. My client has specifically requested that I handle this case due to my familiarity with this type of litigation.

5. I intend to abide by the Local Rules of the United States District Court for the District of Massachusetts and will cooperate to the fullest extent with local counsel, John B. Johnson, Esquire to ensure that my participation in this matter will in no way hinder or delay the prosecution of this case.

Signed under the pains and penalties of perjury this 23rd day of November, 2005

Robert Brown, Esq.



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